

Comments of Diana Van Vleet – As Prepared for Delivery
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On

The U.S. Environmental Protection Agency's Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review Docket ID No. EPA-HQ-OAR-2021-0317 FRL-8510-02-OAR
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Hello, my name is Diana Van Vleet, I am the National Director of Outreach & Engagement at the American Lung Association. Thank you for the opportunity to speak today. I strongly support EPA's proposed methane rules and urge EPA to strengthen the rules to maximize the benefits for public health.

During this hearing you will hear from others about the urgency needed when it comes to taking bold action on climate, and about the sweeping health harms of climate change. What I'd like to underscore today is just how commonsense and popular these protections from oil and gas pollution are. I'd also like to highlight the immediate health benefits they would provide, especially for fence-line communities living near oil and gas operations.

The nation has the tools and technology to cut methane pollution from new and existing oil and gas operations right now. And while EPA's proposal is a good first step, it does not go far enough to address pollution from methane flares or require frequent and ongoing inspections of covered sources. EPA's final rule must eliminate routine flaring and must not include loopholes that allow any wells to forgo regular inspections.

Flaring is a wasteful practice that is widespread in the oil and gas production sector. Some companies forgo investments necessary to capture and sell gas and instead burn it as a waste product, emitting a host of climate and health-harming pollutants. Flares also commonly malfunction and spew methane directly into the atmosphere.

Thankfully, flaring is avoidable. Leading operators have virtually eliminated flaring across their operations and states like Colorado and New Mexico have moved to eliminate flaring except in emergency situations. EPA should likewise move to end routine flaring.

EPA should also strengthen monitoring requirements by requiring regular monitoring at smaller, high polluting wells. Hundreds of thousands of wells across the country generate just a trickle of usable gas but are large and disproportionate emitters of methane. Under EPA's current proposal, some operators could still escape regular leak monitoring. Let's make sure that oil and gas wells aren't emitting harmful pollution needlessly.

It is important to note that safeguards to reduce methane pollution are popular. There is broad support for strong federal methane safeguards among the public. New polling data shows 71 percent of registered voters support the U.S. strengthening rules to reduce oil and gas methane pollution including by requiring frequent inspections at smaller leak prone wells. Additionally, past American Lung Association polls have found similar support – one of our polls from 2015 found that two-thirds of voters favored EPA placing tougher standards on methane and other toxic pollution from the oil and gas industry.

Most importantly, these measures would result in immediate health benefits for some of the most vulnerable populations.

As you've heard today, the extraction and production of methane by the oil and gas industry drives climate change. But it also leads to the release of other forms of air pollution. Most notable are volatile organic compounds, or VOCs. Some VOCs can cause cancer, affect the nervous system, or cause birth defects. In addition to being toxic, VOCs contribute to the formation of ground-level ozone when they mix with the nitrogen oxides from diesel-fueled trucks and equipment at fracking sites.

Exposure to ground-level ozone, also known as smog, can cause irreversible damage to the lungs and significantly increase the chance of premature death. It contributes to asthma attacks and aggravates other chronic lung diseases and pre-existing heart problems. Ozone is also linked to premature birth, which with low birth weight is a leading cause of infant death.

Communities living near oil and gas operations are especially at risk from these toxic emissions. Children are particularly vulnerable to both ozone and VOC pollution due to their faster breathing rate, proportion of time spent outside, and developing lungs. Reducing the levels of VOCs and ozone would make an important contribution to children's respiratory development and health.

Thank you for taking this critical first step toward reducing pollution from oil and gas operations. EPA needs to go further to protect health and address climate change. On behalf of the American Lung Association, I urge EPA to set stronger standards, eliminate loopholes for smaller operations, and end venting and flaring from oil and gas facilities. Finally I urge EPA to finalize this rulemaking as quickly as possible. There is no time to waste, and we cannot miss out on this opportunity to protect health, particularly for the most vulnerable populations.